

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

CAMPBELL SOUP

EPA SITE NUMBER: CAD009198367

SACRAMENTO, CA

SCORED BY: FREDRICK MOORE

OF H-3-2, HWMD, EPA R9

ON 03/31/92

GROUNDWATER SCORE : 41.46

SURFACE WATER SCORE: 0.45

AIR ROUTE SCORE : 4.58

ONSITE SCORE : 0.00

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MIGRATION SCORE : 20.86

Low

February 1991

Fifteen persons presented oral and/or written comments at the November 27, 1990 public hearing. Six more written comments were received during the full comment period; three of these were from commentators at the public hearing and were essentially the same as or a continuation of what they submitted at the public hearing. Commentators included interested members of the community, CWMI, three environmental groups, and two public agencies. Comments concerning draft modifications to conditions in the hazardous waste facility permit issued by the DHS are not addressed herein. This Response to Comments will only reply to comments as they pertain to the draft permit issued by EPA.

For brevity and clarity, the format of the Response to Comments will be to quote or summarize the issue as stated by an individual commentator, then provide a discussion of EPA's position and a final response. Responses to similar issues will be referenced by, for example, "See Response 1.a.," where Response 1.a. is the response to the first issue presented by the first commentator. Applicable federal regulations are abbreviated by, for example, "40 CFR 124.1" for Title 40 of the Code of Federal Regulations, Part 124.1.

A transcript of the November 27, 1990 public hearing presentations and comments is provided as Attachment I. Written comments in their entirety are provided as Attachment II. EPA encourages readers to examine these attachments. Only the conditions of the draft permit which were revised in response to comments will be reproduced in this Response to Comments.

It is important to note that this Permit Modification request did not propose conceptual waste management units which have not previously been examined through the formal Permit Modification review process. This Permit Modification was primarily for approval of the Detailed Design Plans of units previously approved in concept. At this time, EPA is responding to significant comments regarding concerns about the facility even if the comments do not pertain to specific issues or modified conditions of this draft permit.

Although not required, EPA is responding to those issues at this time because public participation and awareness are important, and there have been concerns expressed by the public about public participation opportunities in the past. In the future, EPA does not intend to continue to respond to issues outside of the scope of permit modifications. The public should be aware that only the draft permit conditions that have been modified or opened may be changed in the final permit.

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? Y

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : NA

NET PRECIPITATION (IN.) : NA

PHYSICAL STATE: NA

CONTAINMENT:

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: TRICHLOROETHENE

TOXICITY/PERSISTENCE VALUE: 12

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0  
DRUMS : 0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

GROUNDWATER USE: DRINKING WATER

DISTANCE TO WELL (MILES): 0.5

February 1991

## INTRODUCTION

The U.S. Environmental Protection Agency (EPA) issued for public review and comment on October 26, 1990, a draft Resource Conservation and Recovery Act (RCRA) Permit, Modification #3 (permit) for the Kettleman Hills Facility (KHF) owned and operated by Chemical Waste Management, Inc. (CWMI). This draft permit was prepared in response to several Class II permit modification requests from CWMI, dated July 31, 1990. The primary purpose of the Class II requests was to approve and incorporate into the permit detailed design plans for four waste management units previously approved in concept:

1. Evaporative Tank System consisting of up to eight 1,000,000 gallon above-ground tanks for treatment by solar evaporation of dilute aqueous, non-reactive, non-ignitable wastestreams;
2. Landfill B-18, a 55.2 acre landfill, and the associated Supplemental Groundwater Monitoring System and construction quality assurance plans;
3. Second Generation Stabilization System, and associated construction quality assurance and operation plans; and
4. Stabilized Bulk Waste Storage Area, and associated construction quality assurance and operation plans.

In addition, CWMI requested revisions to the facility Waste Acceptance List, Waste Analysis Plan, PCB Flushing/Storage Operation Plan, and Drum Storage Plan. Some of these items were Class I permit modification requests; some were Class II requests.

Although not required, EPA decided to extend the agency review period, issue a draft permit with a 45 day public comment period beginning October 26, 1990, change some of CWMI's proposed modifications, and schedule a public hearing for November 27, 1990. This was done partly in response to public concern and partly because the California Department of Health Services (DHS) wished to conduct a joint public comment period and hearing at that time. CWMI agreed to the extended review period so that the agencies could better coordinate their technical reviews and public notification and participation efforts.

The public comment period for the draft permit ended on December 10, 1990, but was extended to January 9, 1991 in response to concerns raised at the November 27, 1990 public hearing for this draft permit.

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? N

IS THERE A PERMITTED OUTFALL? Y

HAVE THERE BEEN PERMIT VIOLATIONS? N

ROUTE CHARACTERISTICS

FACILITY LOCATION: OTHER

24-HOUR RAINFALL: 2.0

DISTANCE TO SURFACE WATER (MILES): 1.25

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: VERY GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: F003

TOXICITY/PERSISTENCE VALUE: 6

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS:	0
DRUMS :	0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

SURFACE WATER USE: QUALITY NOT IMPACTED BUT WITHIN THREE

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 1.5

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 1.5

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N  
DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? Y  
HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY  
CAN CONTAMINANTS MIGRATE INTO AIR? Y  
CONTAINMENT: VERY GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: F003  
TOXICITY/PERSISTENCE VALUE: 2  
QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0  
DRUMS : 0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES  
DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.1

EPA ID NO. : CAD009  
CAMPBELL SOUP

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: INACCESSIBLE

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? N

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: BENZENE

TOXICITY/PERSISTENCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.10

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N